

Exhibit C

EXHIBIT C**UNITED STATES PATENT NO. 8,948,784****CLAIM CHART FOR INFRINGEMENT OF REPRESENTATIVE INDEPENDENT CLAIM 1**

Note: This representative claim chart is provided solely for pleading purposes in this action and is based upon information known at this time. This chart does not represent Plaintiff's infringement contentions, the asserted claims, or all of Plaintiff's allegations regarding infringement. Plaintiff further reserves the right to assert additional or different theories of infringement, including infringement under the doctrine of equivalents.

Infringement analysis provided for any preamble should not be construed as an admission that such preamble is limiting.

US8948784	Google Geofencing API (The accused instrumentality)
1. A computer-implemented method of assessing whether a mobile device is in a geospatial area, the method comprising:	To the extent the preamble is limiting, the accused instrumentality offers a method for assessing (e.g., location of the user) whether a mobile device (e.g., smartphone, laptop, tablet or other handheld device) is in a geospatial area (e.g., through its built-in GPS and other location based sensors). Defendant offers a Geofencing API for mobile app developers to use and enable geo-fence defining capabilities using the user's mobile's built-in sensors such as GPS, accelerometer and other location based sensors. Defining the geo-fences enable the app developers to determine a mobile device context information and provide results or notification the users based on certain interests.

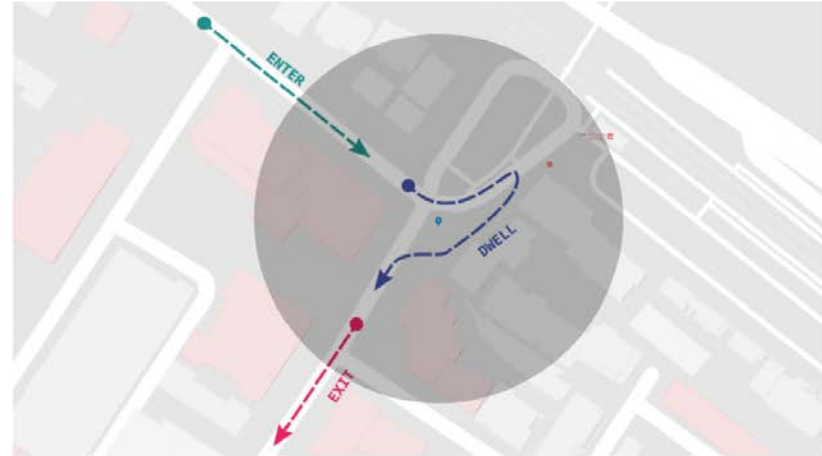
Provide contextual experiences when users enter or leave an area of interest

Sometimes users want to use a particular app when they are in a specific type of location, such as an airport, or a supermarket. However, users have to navigate to that app and then take a specific action within it while they are near the area of interest.

The geofencing API allows you to define perimeters, also referred to as geofences, which surround the areas of interest. Your app gets a notification when the device crosses a geofence, which allows you to provide a useful experience when users are in the vicinity.

For example, an airline app can define a geofence around an airport when a flight reservation is near boarding time. When the device crosses the geofence, the app can send a notification that takes users to an activity that allows them to get their boarding pass.

The Geofencing API intelligently uses the device sensors to accurately detect the location of the device in a battery-efficient way.



Receive notifications when users trigger your geofences

Easily create and start monitoring geofences

You can create a list of geofence objects by setting the latitude, longitude, radius, duration, and transition types of each geofence. The transition types indicate the events that trigger the geofence, such as when users enter or exit a geofence.

Once you have a list of geofences, you can add it to a geofencing request. When it's time to start monitoring the geofences, add the request to a geofencing client along with a `PendingIntent` object, which tells the API how to deliver the geofencing events to your app.

Perform an action when users trigger a geofence

The Geofencing API delivers the events to an `IntentService` in your app, which removes the need to have a service running in the background for geofencing purposes. The service is only invoked when there's relevant information.

Your service receives the geofencing event from the `Intent`, including the list of geofences triggered. You can specify your own logic to decide what actions to take.

Source: <https://developers.google.com/location-context/geofencing/>

Create and monitor geofences

Geofencing combines awareness of the user's current location with awareness of the user's proximity to locations that may be of interest. To mark a location of interest, you specify its latitude and longitude. To adjust the proximity for the location, you add a radius. The latitude, longitude, and radius define a geofence, creating a circular area, or fence, around the location of interest.

You can have multiple active geofences, with a limit of 100 per app, per device user. For each geofence, you can ask Location Services to send you entrance and exit events, or you can specify a duration within the geofence area to wait, or *dwell*, before triggering an event. You can limit the duration of any geofence by specifying an expiration duration in milliseconds. After the geofence expires, Location Services automatically removes it.

Source: <https://developer.android.com/training/location/geofencing#CreateAdd>

“Geofencing is a feature in a software program that uses the global positioning system to define geographical boundaries. Combining a user position with a geofence perimeter, it is possible to know if the user is inside or outside the geofence or even if he is exiting or entering the area.

Geofence API is part of Google's Location APIs. It includes `Geofence`, `GeofencingRequest`, `GeofenceApi`, `GeofencingEvent`, and `GeofenceStatusCodes`.

`Geofence` is an interface that **represents a geographical area that should be monitored**. It is created by using the `Geofence.Builder`. During its creation, you set the monitored region, the geofence's expiration date, responsiveness, an identifier, and the kind of transitions that it should be looking for.”

Source: <https://en.proft.me/2017/06/6/geographical-boundaries-geofencing-android/> (emphasis added)

	<h2><u>Geofence</u></h2> <p>public interface Geofence</p> <p><u>Represents a geographical region, also known as a geofence. Geofences can be monitored by geofencer service. And when the user crosses the boundary of a geofence, an alert will be generated.</u></p> <p>Nested Class Summary</p> <hr/> <p>class Geofence.Builder <u>A builder that builds Geofence.</u></p> <hr/> <p>Source: https://developers.google.com/android/reference/com/google/android/gms/location/Geofence</p>						
<p>receiving, at a mobile device, a representation of a non-circular geospatial zone;</p>	<p>The accused instrumentality offers a method to receive a representation of a non-circular geospatial zone (e.g., through Google Maps API and setting a geofence using <code>Geofence.Builder</code> class).</p> <pre>public Geofence.Builder setCircularRegion (double latitude, double longitude, float radius)</pre> <p><u>Sets the region of this geofence. The geofence represents a circular area on a flat, horizontal plane.</u></p> <p>Parameters</p> <table border="1"> <tbody> <tr> <td>latitude</td><td>latitude in degrees, between -90 and +90 inclusive</td></tr> <tr> <td>longitude</td><td>longitude in degrees, between -180 and +180 inclusive</td></tr> <tr> <td>radius</td><td>radius in meters</td></tr> </tbody> </table> <p>Source: https://developers.google.com/android/reference/com/google/android/gms/location/Geofence.Builder</p>	latitude	latitude in degrees, between -90 and +90 inclusive	longitude	longitude in degrees, between -180 and +180 inclusive	radius	radius in meters
latitude	latitude in degrees, between -90 and +90 inclusive						
longitude	longitude in degrees, between -180 and +180 inclusive						
radius	radius in meters						

Add maps

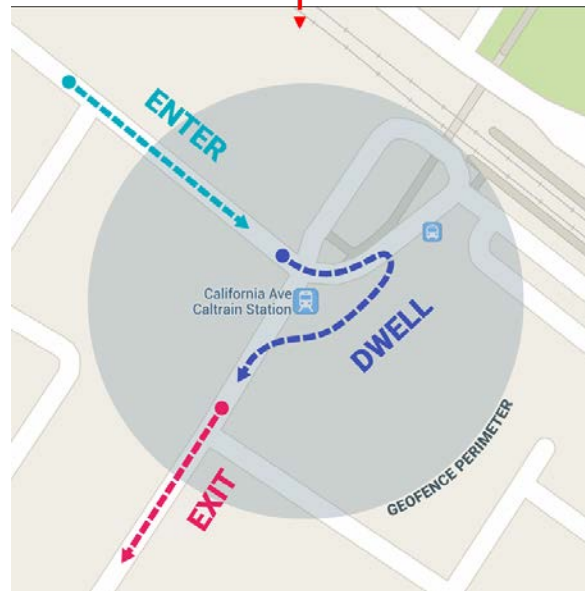
Allow your users to explore the world with rich maps provided by Google. Identify locations with custom markers, augment the map data with image overlays, embed one or more maps as fragments, and much more.

The [Google Maps Android API](#) allows you to include maps and customized mapping information in your app.



Source: <https://developer.android.com/training/maps/>

Map representing a non-circular
geospatial area



Source: <https://developers.google.com/location-context/geofencing/> (annotated)

	<h2><u>Request location updates</u></h2> <p>Appropriate use of location information can be beneficial to users of your app. For example, <u>if your app helps the user find their way while walking or driving, or if your app tracks the location of assets, it needs to get the location of the device at regular intervals. As well as the geographical location (latitude and longitude), you may want to give the user further information such as the bearing (horizontal direction of travel), altitude, or velocity of the device. This information, and more, is available in the <code>Location</code> object that your app can retrieve from the <code>fused location provider</code>.</u> In response, the API updates your app periodically with the best available location, based on the currently-available location providers such as WiFi and GPS (Global Positioning System). The accuracy of the location is determined by the providers, the location permissions you've requested, and the options you set in the location request.</p> <p>This lesson shows you how to request regular updates about a device's location using the <code>requestLocationUpdates()</code> method in the fused location provider.</p> <p>Source: https://developer.android.com/training/location/request-updates</p>
causing storage of the representation of the non-circular geospatial zone in a memory of the mobile device;	Upon information and belief, the accused instrumentality causes storage of the representation of the non-circular geospatial zone in a memory of the mobile device (e.g., via an instance state stored in a <code>Bundle</code> object, Google Maps data layer, app storage using Geofencing API).

Save the state of the activity

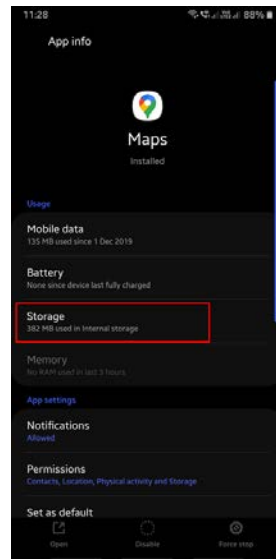
A change to the device's configuration, such as a change in screen orientation or language, can cause the current activity to be destroyed. Your app must therefore store any information it needs to recreate the activity. One way to do this is via an instance state stored in a `Bundle` object.

The following code sample shows how to use the activity's `onSaveInstanceState()` callback to save the instance state:

KOTLIN JAVA

```
override fun onSaveInstanceState(outState: Bundle?) {  
    outState?.putBoolean(REQUESTING_LOCATION_UPDATES_KEY, requestingLocationUpdates)  
    super.onSaveInstanceState(outState)  
}
```

Source: <https://developer.android.com/training/location/request-updates#save-state>



Source: Actual Screenshot (Android 10)

Data Layer

The Google Maps Data layer provides a container for arbitrary geospatial data. You can use the Data layer to store your custom data, or to display GeoJSON data on a Google map.

Overview

Watch this DevBytes video to learn more about the Data Layer.

With the Maps JavaScript API you can mark up a map with a variety of overlays, such as markers, polylines, polygons, etc. Each of these annotations combines styling information with location data. The `google.maps.Data` class is a container for arbitrary geospatial data. Instead of adding these overlays, you can use the Data layer to add arbitrary geographical data to your map. If that data contains geometries, such as points, lines or polygons, the API will render these by default as markers, polylines and polygons. You can style these features as you would a normal overlay, or apply styling rules based on other properties contained in your data set.



Source: <https://developers.google.com/maps/documentation/javascript/datalayer>

determining, based at least in part on the non-circular geospatial zone, an outer circular boundary entirely encompassing the non-circular geospatial zone, wherein the outer circular boundary is

The accused instrumentality determines based at least in part on the non-circular geospatial zone (e.g., Maps) an outer circular boundary entirely encompassing the non-circular geospatial zone wherein the outer circular boundary is defined by at least a centroid of the non-circular geospatial zone and a maximum radius (e.g., Circle class part of Location reference APIs from google. This class is defined as being a circle on the earth's surface (spherical cap)).

defined by at least a centroid of the non-circular geospatial zone and a maximum radius;

```
public Geofence.Builder setCircularRegion (double latitude, double longitude, float radius)
```

Sets the region of this geofence. The geofence represents a circular area on a flat, horizontal plane.

Parameters

latitude	latitude in degrees, between -90 and +90 inclusive
longitude	longitude in degrees, between -180 and +180 inclusive
radius	radius in meters

Source:

<https://developers.google.com/android/reference/com/google/android/gms/location/Geofence.Builder>

Add maps

Allow your users to explore the world with rich maps provided by Google. Identify locations with custom markers, augment the map data with image overlays, embed one or more maps as fragments, and much more.

The [Google Maps Android API](#) allows you to include maps and customized mapping information in your app.



Source: <https://developer.android.com/training/maps/>

	<h2><u>Circle</u></h2> <p><u>public final class Circle extends Object</u></p> <p><u>A circle on the earth's surface (spherical cap).</u></p> <p><u>A circle has the following properties.</u></p> <p><u>Center</u></p> <p><u>The center of the Circle is specified as a LatLng.</u></p> <p><u>Radius</u></p> <p><u>The radius of the circle, specified in meters. It should be zero or greater.</u></p> <p>Example</p> <pre> GoogleMap map; // ... get a map. // Add a circle in Sydney Circle circle = map.addCircle(new CircleOptions() .center(new LatLng(-33.87365, 151.20689)) .radius(10000) .strokeColor(Color.RED) .fillColor(Color.BLUE)); </pre> <p>Source: https://developers.google.com/android/reference/com/google/android/gms/maps/model/Circle</p>
<p>determining, based at least in part on the non-circular geospatial zone, an inner circular boundary entirely encompassed within</p>	<p>The accused instrumentality determines based at least in part on the non-circular geospatial zone (e.g., Maps) an inner circular boundary entirely encompassed within the non-circular geospatial zone, wherein the inner circular boundary is defined by at least the centroid of the non-circular geospatial zone and a minimum radius (e.g., boundary of geofence is set by adjusting the latitude, longitude, centroid and minimum radius.)</p>

the non-circular geospatial zone, wherein the inner circular boundary is defined by at least the centroid of the non-circular geospatial zone and a minimum radius;

First, use `Geofence.Builder` to create a geofence, setting the desired radius, duration, and transition types for the geofence. For example, to populate a list object:

```

KOTLIN  JAVA

geofenceList.add(new Geofence.Builder()
    // Set the request ID of the geofence. This is a string to identify this
    // geofence.
    .setRequestId(entry.getKey())

    .setCircularRegion(
        entry.getValue().latitude,
        entry.getValue().longitude,
        Constants.GEOFENCE_RADIUS_IN_METERS
    )
    .setExpirationDuration(Constants.GEOFENCE_EXPIRATION_IN_MILLISECONDS)
    .setTransitionTypes(Geofence.GEOFENCE_TRANSITION_ENTER |
        Geofence.GEOFENCE_TRANSITION_EXIT)
    .build());

```

This example pulls data from a constants file. In actual practice, apps might dynamically create geofences based on the user's location.

Source: <https://developer.android.com/training/location/geofencing#java>

Easily create and start monitoring geofences

You can create a list of geofence objects by setting the latitude, longitude, radius, duration, and transition types of each geofence. The transition types indicate the events that trigger the geofence, such as when users enter or exit a geofence.

Once you have a list of geofences, you can add it to a geofencing request. When it's time to start monitoring the geofences, add the request to a geofencing client along with a `PendingIntent` object, which tells the API how to deliver the geofencing events to your app.

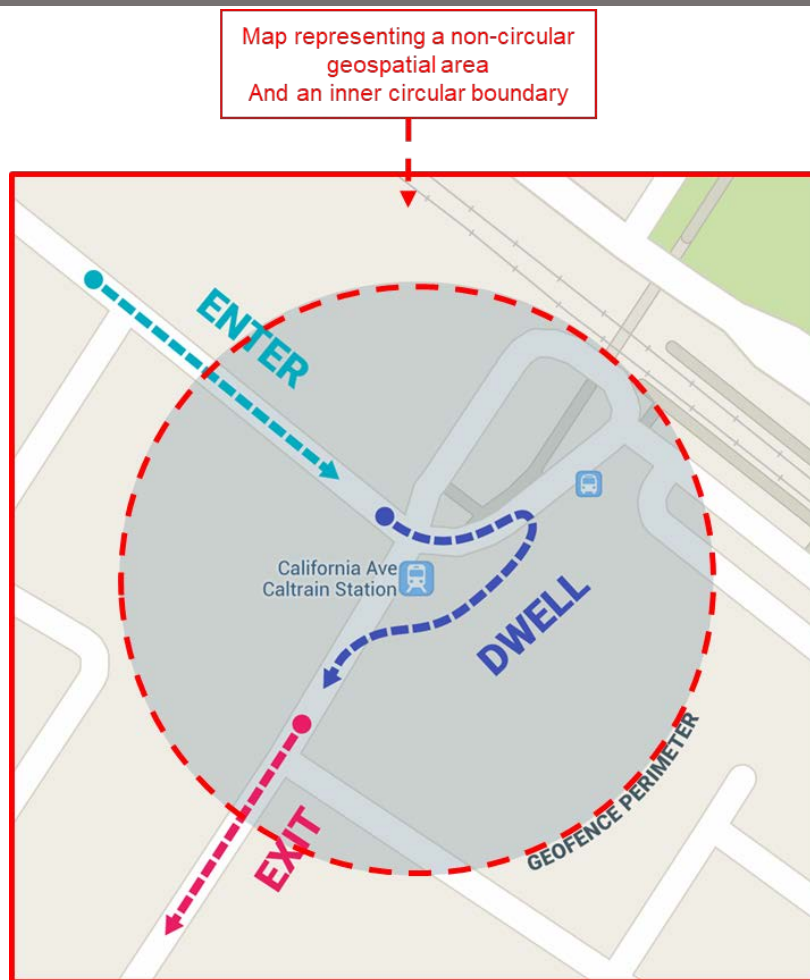
Source: <https://developers.google.com/location-context/geofencing>

Create and monitor geofences

Geofencing combines awareness of the user's current location with awareness of the user's proximity to locations that may be of interest. To mark a location of interest, you specify its latitude and longitude. To adjust the proximity for the location, you add a radius. The latitude, longitude, and radius define a geofence, creating a circular area, or fence, around the location of interest.

You can have multiple active geofences, with a limit of 100 per app, per device user. For each geofence, you can ask Location Services to send you entrance and exit events, or you can specify a duration within the geofence area to wait, or *dwell*, before triggering an event. You can limit the duration of any geofence by specifying an expiration duration in milliseconds. After the geofence expires, Location Services automatically removes it.

Source: <https://developer.android.com/training/location/geofencing#CreateAdd>



Source: <https://developer.android.com/training/location/geofencing>

	<p>The geofencing API allows you to define perimeters, also referred to as <i>geofences</i>, which surround the areas of interest. Your app gets a notification when the device crosses a geofence, which allows you to provide a useful experience when users are in the vicinity.</p> <p>Source: https://developers.google.com/location-context/geofencing/</p> <p><u>Choose the optimal radius for your geofence</u></p> <p><u>For best results, the minimum radius of the geofence should be set between 100 - 150 meters.</u> When Wi-Fi is available location accuracy is usually between 20 - 50 meters. When indoor location is available, the accuracy range can be as small as 5 meters. Unless you know indoor location is available inside the geofence, assume that Wi-Fi location accuracy is about 50 meters.</p> <p>When Wi-Fi location isn't available (for example, when you are driving in rural areas) the location accuracy degrades. <u>The accuracy range can be as large as several hundred meters to several kilometers. In cases like this, you should create geofences using a larger radius.</u></p> <p>Source: https://developer.android.com/training/location/geofencing#choose-the-optimal-radius-for-your-geofenceAnalyst</p>
<p>computing a current distance of the mobile device from the centroid of the non-circular geospatial zone; and</p>	<p>The accused instrumentality computes current distance of the mobile device from the centroid of the non-circular geospatial zone (e.g., the current distance of mobile device from the centroid of the non-circular geospatial zone is measured using latitude, longitude and radius parameters of the geofence builder class).</p> <p><u>Set up for geofence monitoring</u></p> <p><u>The first step in requesting geofence monitoring is to request the necessary permission. To use geofencing, your app must request <code>ACCESS_FINE_LOCATION</code>. If your app targets Android 10 (API level 29) or higher, your app must also request <code>ACCESS_BACKGROUND_LOCATION</code>.</u></p> <p>Source: https://developer.android.com/training/location/geofencing#RequestGeofences</p>

Create and monitor geofences

Geofencing combines awareness of the user's current location with awareness of the user's proximity to locations that may be of interest. To mark a location of interest, you specify its latitude and longitude. To adjust the proximity for the location, you add a radius. The latitude, longitude, and radius define a geofence, creating a circular area, or fence, around the location of interest.

You can have multiple active geofences, with a limit of 100 per app, per device user. For each geofence, you can ask Location Services to send you entrance and exit events, or you can specify a duration within the geofence area to wait, or *dwell*, before triggering an event. You can limit the duration of any geofence by specifying an expiration duration in milliseconds. After the geofence expires, Location Services automatically removes it.

Source: <https://developer.android.com/training/location/geofencing#CreateAdd>

The Geofencing API intelligently uses the device sensors to accurately detect the location of the device in a battery-efficient way.

Source: <https://developers.google.com/location-context/geofencing/>

The geofencing API allows you to define perimeters, also referred to as *geofences*, which surround the areas of interest. Your app gets a notification when the device crosses a geofence, which allows you to provide a useful experience when users are in the vicinity.

Source: <https://developers.google.com/location-context/geofencing/>

Choose the optimal radius for your geofence

For best results, the minimum radius of the geofence should be set between 100 - 150 meters. When Wi-Fi is available location accuracy is usually between 20 - 50 meters. When indoor location is available, the accuracy range can be as small as 5 meters. Unless you know indoor location is available inside the geofence, assume that Wi-Fi location accuracy is about 50 meters.

When Wi-Fi location isn't available (for example, when you are driving in rural areas) the location accuracy degrades. The accuracy range can be as large as several hundred meters to several kilometers. In cases like this, you should create geofences using a larger radius.

Source: <https://developer.android.com/training/location/geofencing#choose-the-optimal-radius-for-your-geofence>Analyst

Geofence

public interface **Geofence**

Represents a geographical region, also known as a geofence. Geofences can be monitored by geofencer service. And when the user crosses the boundary of a geofence, an alert will be generated.

Nested Class Summary

class	Geofence.Builder	A builder that builds Geofence .
-------	----------------------------------	--

Constant Summary

int	GEOFENCE_TRANSITION_DWELL	The transition type indicating that the user enters and dwells in geofences for a given period of time.
int	GEOFENCE_TRANSITION_ENTER	The transition type indicating that the user enters the geofence(s).
int	GEOFENCE_TRANSITION_EXIT	The transition type indicating that the user exits the geofence(s).
long	NEVER_EXPIRE	Expiration value that indicates the geofence should never expire.

Source: <https://developers.google.com/android/reference/com/google/android/gms/location/Geofence>

in response to a determination that the computed current distance both exceeds the minimum radius and does not exceed the maximum radius, utilizing the non-circular geospatial zone to determine a context of the mobile device.

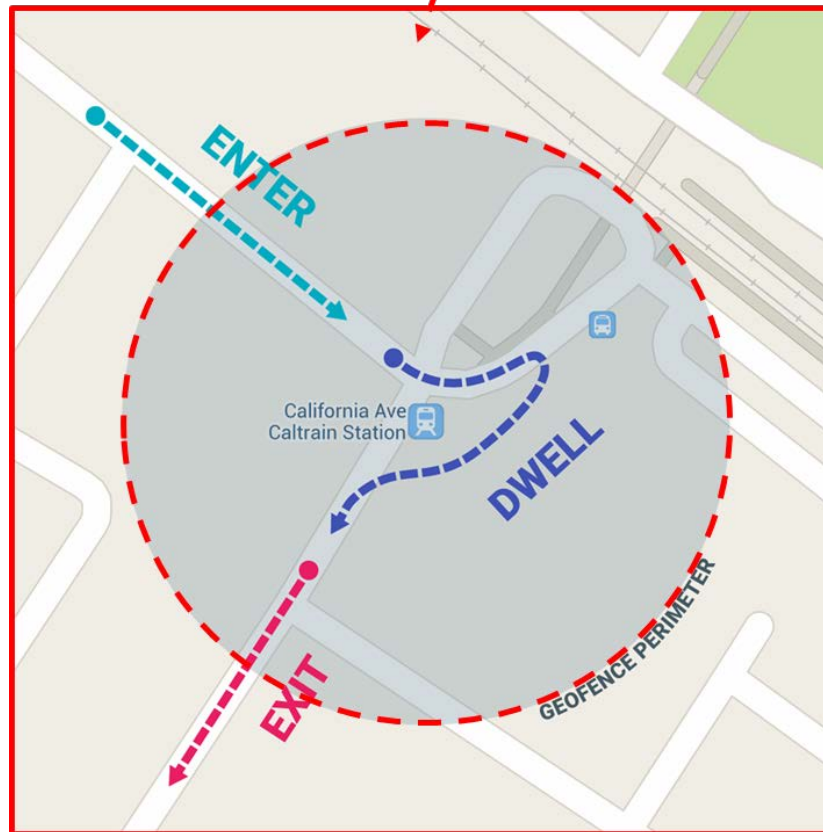
The accused instrumentality determines that the computed current distance both exceeds the minimum radius and does not exceed the maximum radius and utilizes the non-circular geospatial zone to determine a context of the mobile device (e.g., based on location and motion (context) of the mobile device, if the users location triggers geofence boundary, notifications may be provided to the users on their device.)

Create and monitor geofences

Geofencing combines awareness of the user's current location with awareness of the user's proximity to locations that may be of interest. To mark a location of interest, you specify its latitude and longitude. To adjust the proximity for the location, you add a radius. The latitude, longitude, and radius define a geofence, creating a circular area, or fence, around the location of interest.

You can have multiple active geofences, with a limit of 100 per app, per device user. For each geofence, you can ask Location Services to send you entrance and exit events, or you can specify a duration within the geofence area to wait, or *dwell*, before triggering an event. You can limit the duration of any geofence by specifying an expiration duration in milliseconds. After the geofence expires, Location Services automatically removes it.

Map representing a non-circular
geospatial area with max radius
And an inner circular boundary with
min radius



Source: <https://developer.android.com/training/location/geofencing#CreateAdd> (annotated)

Geofence

public interface **Geofence**

Represents a geographical region, also known as a geofence. Geofences can be monitored by geofencer service. And when the user crosses the boundary of a geofence, an alert will be generated.

Nested Class Summary

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int	GEOFENCE_TRANSITION_DWELL	The transition type indicating that the user enters and dwells in geofences for a given period of time.
int	GEOFENCE_TRANSITION_ENTER	The transition type indicating that the user enters the geofence(s).
int	GEOFENCE_TRANSITION_EXIT	The transition type indicating that the user exits the geofence(s).
long	NEVER_EXPIRE	Expiration value that indicates the geofence should never expire.

Source: <https://developers.google.com/android/reference/com/google/android/gms/location/Geofence>

Specify geofences and initial triggers

The following snippet uses the `GeofencingRequest` class and its nested `GeofencingRequest.Builder` class to specify the geofences to monitor and to set how related geofence events are triggered:

KOTLIN

JAVA

```

private GeofencingRequest getGeofencingRequest() {
    GeofencingRequest.Builder builder = new GeofencingRequest.Builder();
    builder.setInitialTrigger(GeofencingRequest.INITIAL_TRIGGER_ENTER);
    builder.addGeofences(geofenceList);
    return builder.build();
}

```

This example shows the use of two geofence triggers. The `GEOFENCE_TRANSITION_ENTER` transition triggers when a device enters a geofence, and the `GEOFENCE_TRANSITION_EXIT` transition triggers when a device exits a geofence. Specifying `INITIAL_TRIGGER_ENTER` tells Location services that `GEOFENCE_TRANSITION_ENTER` should be triggered if the device is already inside the geofence.

In many cases, it may be preferable to use instead `INITIAL_TRIGGER_DWELL`, which triggers events only when the user stops for a defined duration within a geofence. This approach can help reduce "alert spam" resulting from large numbers notifications when a device briefly enters and exits geofences. Another strategy for getting best results from your geofences is to set a minimum radius of 100 meters. This helps account for the location accuracy of typical Wi-Fi networks, and also helps reduce device power consumption.

Source: <https://developer.android.com/training/location/geofencing#java>